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Attorneys for Defendant / Cross Claimant
HAWAIIAN ELECTRIC COMPANY

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

MOTORS INSURANCE
CORPORATION and BIG ISLAND
TOYOTA,

Plaintiffs,

vs.

YOUNG BROTHERS, LIMITED;
JOHN DOES 1-10; JANE DOES 1-10;
and DOE ENTITIES 1-10,

Defendants.

CIVIL NO. CV 04-00724 HG/BMK

DEFENDANT/CROSS-CLAIMANT
HAWAIIAN ELECTRIC
COMPANY'S MOTION FOR
DEFAULT JUDGMENT AGAINST
CROSS-CLAIM DEFENDANTS
AMERICAN PACIFIC TRANSPORT
CO., LTD AND PIRELLI CABLE
NORTH AMERICA, INC.;
DECLARATION OF RANDOLF
L.M. BALDEMOR;

EXHIBITS "A" – "D";
CERTIFICATE OF SERVICE

**DEFENDANT/CROSS-CLAIMANT HAWAIIAN ELECTRIC
COMPANY'S MOTION FOR DEFAULT JUDGMENT AGAINST
CROSS-CLAIM DEFENDANTS AMERICAN PACIFIC TRANSPORT
CO., LTD AND PIRELLI CABLE NORTH AMERICA, INC.**

Defendant / Cross Claimant HAWAIIAN ELECTRIC COMPANY

("HECO"), by its attorneys, hereby moves this Honorable Court for default judgment in the above-entitled action against Cross-Claim Defendants American Pacific Transport Co., Ltd. ("APT") and Pirelli Cable North America, Inc., ("Pirelli") (hereinafter collectively referred to as "Cross-Claim Defendants") on the grounds that (1) default was entered against both APT and Pirelli on February 22, 2006 for failure to answer or otherwise defend against HECO's Cross-Claim against them, filed herein on December 8, 2005, (2) Cross-Claim Defendants have entered no appearance or moved to remove the entry to default, and (3) the amount of judgment is now certain. Further Cross-Claim Defendants are individual companies, and are not infants or an incompetent persons.

WHEREFORE, HECO requests this Court make and enter judgment on its Cross-Claim against APT and Pirelli, in the amount of \$4,500.00, plus costs in the amount of \$249.75, as well as post-judgment interest.

This motion is made pursuant to Rules 54 and 55 of the Federal Rules of Civil Procedure, the memorandum in support, declaration of counsel and exhibits attached hereto, and the records and files herein.

DATED: Honolulu, Hawaii, September 19, 2006.

/s/ Randolph L.M. Baldemor

RANDOLF L. M. BALDEMOR

SUSAN A. LI

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HAWAIIAN ELECTRIC COMPANY